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European Tyre and Rim Technical Organisation

To : Mr. R. Shelton
Director of NHTSA
US Department of Transportation
400 Seventh street SW
Washington DC 20590
USA

Brussels, 27th February 2001
TAL 051-01-ETR-NHTSA-LABEL

Dear Mr. Shelton,

Subject : Advance Notice of proposed Rulemaking on Tire Sidewall Labeling Requirements Docket N° NHTSA.00.8296 -22

On behalf of the European Tyre Manufacturers, ETRTO would like to comment respectfully Docket N° NHTSA 00.8296 on Tyre Sidewall Labeling Requirements, as per attachment.

We apologise for the late comment and thank you for understanding.

Yours Sincerely,

Léon Chession
Secretary General

Attachment : ETRTO's Comments on ANPRM on NHTSA - OO.8296

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Comments of the European Tyre and Rim Technical Organisation on

Advance Notice of Proposed Rulemaking on Tire Sidewall Labeling Requirements

National Highway Traffic Safety Administration U. S. Department of Transportation

Docket No. NHTSA-00-8296

Introduction

ETRTO is the European Technical Organisation establishing and promulgating interchangeability standards for tyres, rims and valves for the guidance of manufacturers of such products, designers and manufacturers of motor vehicles and other wheeled vehicles and equipment, and governmental and other regulatory bodies.

Our comments are contained on the following pages and correspond to some of the 31 questions presented for public comment in the ANPRM which are of international concern. ETRTO also intends to participate fully in any subsequent rulemaking proceeding that addresses the issues presented in this ANPRM and to provide additional information to NHTSA to assist the agency in promulgating regulations consistent with the provisions of the TREAD Act.

ETRTO' s Responses to Questions Presented in the ANPRM

General Consumer Knowledge and Behaviour/Availability of Information to Consumers

Consumer Information for Safety and Recall

ETRTO believes that information needed to maintain tyres properly is available to consumers. Such information is routinely found on, for passenger cars, the vehicle's tyre placard, which is required to be permanently affixed to the glove compartment door or an equally accessible location; and for multipurpose passenger vehicles, trucks, buses, trailers, and motorcycles, this information is found on the vehicle's certification label. Information on tyre care and maintenance is also often found in the vehicle owner's manual.

Consumers need four basic pieces of information to safely maintain and care for their tires: (1) size designation, (2) load index value, (3) speed symbol, and (4) cold inflation pressure appropriate for the service. Additionally consumers need the Tyre Identification Number (TIN) in case of a tyre recall. tyre size designation, load index value, speed rating, and TIN can and should be moulded on the sidewall of tires. The correct cold tyre inflation pressure is vehicle and service specific and thus cannot be given on the sidewall.

Consumer Understanding of Available Information (speed, inflation, weight)

ETRTO has no experience on North American consumers understanding of available information. However as far as European consumers are concerned they have been familiar with them for more than 20 years.

Consumer Use of Guidance (inflation) (4)Tyre Information Wanted by Consumers

Many consumers recognise the importance of an adequate tyre inflation pressure to the safe operation of their vehicles.
To assist the driving public and to promote traffic safety, NHTSA should consider requiring tyre pressure information to be available to consumers in a convenient, standard location and format on each vehicle. Providing this information in a standard location and format would allow individual drivers who have multiple vehicles, rent or lease vehicles, or buy new or used vehicles to easily find and use appropriate tyre pressure information. Drivers' education programs could include this information in their programs. tyre manufacturers cannot provide this information on the tyre because it is determined by the vehicle manufacturer and may be dependant on the type of service: for example for Passenger car tyres the appropriate pressure depends on whether the use of the car is with the driver alone in an urban site or the car is used at high speed and maximum of the carrying capacity for long journey on the highways.

TIN Information

Easier to Determine if tyres are Covered by Recall

ETRTO could support a requirement for the TIN to be placed on the intended outboard side of a tire. Cost, timing and any unintended adverse safety consequences due to

changes in the manufacturing process are issues of concern. For example, manufacturers will face substantial costs to change existing moulds. Any requirement for an immediate change, even with several months prior notice, may not be practical and would be very expensive. A suitable phase-in period is recommended.

(6) TIN on Both Sidewalls and (7) Economic Costs for TIN on Both Sidewalls

Because it would not create any additional safety benefits, we cannot support a change that would require the TIN on both sides of the tyre. In fact, placing the TIN on both sides of the tyre could create a workplace safety hazard for tyre industry employees due to changes in the manufacturing process. Such a change could not occur immediately and would likely require several years to complete. Moreover adding the date code changeable plate on the two sidewalls could be the cause of inadverted conflicting information available on the two sidewalls. All existing moulds would have to be changed and in some cases completely modified because of interference with other labels already stamped on the mould . Because tyre production occurs 24 hours a day, seven days a week, there would be substantial lost production costs to make the changes, plus weekly on-going costs to make changes to both sides of moulds. Based on the number of recalls made over the past 30 years, we believe the requirement to place the TIN on both sides of the sidewall is unnecessary given the cost of implementation and lack of added benefit. Instead ETRTO supports placement of the TIN on the intended outboard side of the tyre as a reasonable alternative solution.

(8) TIN Location Relative to Bead and Shoulder (9) TIN Additions/Deletions (10)TIN Optional Symbols (11)TIN Appearance and Readability (12)TIN Symbol Height

The location, the substantive information and the symbol height of the TIN should remain as specified today. The current location provides the best protection from abrasion.
By expanding the information in the TIN, NHTSA would be reducing the legibility of other important safety information.
Tyre manufacturers currently use the optional digits in the TIN. Furthermore, there is no advantage to reducing the digits from 12 to 8. Indeed, in the event of a future recall, information should be clear and consistent. Without identifying a specific, pressing need this information should not be altered.
The appearance and readability of the TIN is currently adequate. Some consumers or vehicle manufacturers may reject any concept of colour and may even try to remove the TIN. Having the TIN on the intended outboard sidewall would resolve any problems with readability.

Other tyre Labeling Information

Load Ratings

(13) Maximum Load Rating Versus Load Index (14) Consumer Understanding/Use of Load Index

The maximum load rating in kilograms/pounds serves no useful purpose and is not needed. Especially in case for high speed tyres, to equip high speed vehicles, it may supply a wrong information thus causing he choice of tyres with a load capacity lower than needed. A load index value should be required on the tyre and on the vehicle tyre placard as is the practice in Europe. The consumer will then simply have to check that the two or three digit number on the tyre is at least equal to that specified on the vehicle tyre placard to assure the proper tyre load capacity for their vehicle. The concept of load index as part of the tyre service description is not new as it was adopted in ISO more than 25 years ago. In Europe the national legislation for the last 20 years have already required load index numbers on tyres and the minimum value required by the vehicle's axle is the criteria for the appropriate choice of the tyre size.

(15) Tyre Retailer Assistance for Correct Load Rating or Load Index

A knowledgeable tyre dealer will be in a position to provide extensive assistance to customers. Nevertheless, regardless of the point of sale, consumers should have help available, as necessary, in selecting the tyre size, load index value, speed symbol, and inflation pressure that is right for their vehicle.

(16) Determination of Inflation/Load Capability

Consumers should use the tyre size designation and the service description (load index and speed symbol) for the selection of the tyre which is suitable for their vehicle. Any information on the appropriate cold inflation pressure for the various tyre positions (front or rear) and for the intended type of service shall be shown on the vehicle's tyre placard.

(17) Vehicle Overloading

Consumers sometimes overload their vehicles. Overloading a tyre results in over deflection which can cause tyre failure. ETRTO has no data on the frequency or degree of overloading which varies from country to country and from type of vehicle to type of vehicle. It has however been frequently verified that tyres are often underinflated with reference to the correct value of pressure required by their vehicle and type of service. Whether overloaded or underinflated the result in either case is over deflection which can build up excessive heat that may result in sudden tyre destruction.

Vehicle manufacturers can help guard against overloading by specifying tyres and operating pressures with some reserve load capacity for vehicles where overloading is reasonably foreseen.

Plies and Cord Material

(18) Number of Plies and Cord Material Plus Related Information (mileage warranty)

The labeling requirement for the number of plies and generic name of cord material is a throw back to a prior era when both cotton and synthetic fibres were used as reinforcement material. Ply ratings were used to recognise the strength differential between cotton and certain synthetic materials. In today's manufacturing environment, a higher number of tread or body plies do not necessarily translate into a better tyre for a given set of circumstances. Providing the consumer with the actual number of plies in a tyre provides no safety value and thus this requirement can be removed to make room for more important information.

Non-safety-related consumer information such as mileage warranty is better communicated to the consumer at the point of sale where the warranty conditions and exclusions can be explained to the consumer verbally and/or via a paper label or brochure, or electronic transmission.

Treadwear Indicators

(19) Label In Vehicle, Sidewall Marking to Pinpoint Location

There is no need to require that information on treadwear indicators be labelled on the vehicle. This information should remain in the owner's manual.

Many manufacturers currently use some mark on the upper sidewall or tread edge to indicate the location of the treadwear indicator. No additional marking is needed. The treadwear indicators are of any use only when they become visible in the tread pattern when the tyre is worn down to 2/32 inch.

ETRTO recommends that the evidence of a treadwear indicator in **any** major groove be used as an indication of wearout.

UTQGS

(20) Treadwear, Traction, Temperature (understanding and usefulness) (21) UTQGS Application to SUVs, MPVs, and Light Trucks

Temperature performance are of no use once speed rating symbol are specified as a compulsory marking inside the service description.

Traction grades should be removed from the tyre and included as part of information communicated to the consumer at the point of sale. We note that the United Nations World Forum for Global Harmonisation of Automobile Standards has a task group working on a global technical regulation for tyre wet grip performance. The Agency should co-ordinate any future requirements on this subject with the ongoing work of the U.N. group.

Manufacturers' warranty programs, for which information is available to consumers at the point of sale, supersede Treadwear grades. Warranty programs are based on tyre treadwear but also address other important safety and maintenance issues important to consumers.

ETRTO does not support labeling additional tyre categories with UTQGS information as our proposal is that UTQGS information should be removed from the sidewall of tyres and replaced by the service description (load index and speed rating). Information on treadwear and traction should be made available to consumers at the point of sale.

Speed Rating

(22) Replacement tyres at Least as High as Original Equipment Tires

A speed rating, in the form of a speed symbol, as already required by ISO and by the ECE/UN regulations shall be required on all tyres and on all vehicle tyre placards. The vehicle placards shall specify a minimum speed symbol compatible with the maximum design speed of the vehicle as already applied by European type approval authorities.

The consumer would then simply have to check that the speed symbol on the tyre is at least equal to that listed in vehicle tyre placard to assure the proper tyre speed capability for their vehicle.

RMA pending petition to NHTSA to revise FMVSS 109 as per GTS 2000, which ETRTO supported, establishes tests for verifying the assigned speed rating of a tire

Run-flat and Extended Mobility Tires

(23) Identify Capability on tyre and/or Vehicle Label

Run-flat or extended mobility tyres should have that capability identified on the tyre and the vehicle tyre placard. An ISO committee is currently studying how to best identify the run-flat capability of a tyre or of equivalent systems. The agency should defer taking any action on this issue until the committee has completed this study.

Retreaded tires

(24) Any Proposed Changes

No changes to FMVSS 117 should be made until or unless relevant, pending decisions on possible changes to FMVSS 109 are issued.

Tire Inflation Pressure

(25) Placard/Certification Label Information and Location

All vehicles should be required to have a tyre placard containing the tyre size designation, the service description (load index and speed symbol), and the cold tyre inflation pressures appropriate for each axle and for the intended service. For speeds above 100 mph the vehicle tyre placard should provide information on additional tyre pressure requirements as specified by standardising bodies (Tire and Rim Association, European Tyre and Rim Technical Organisation, Japan Automobile tyre Manufacturers Association, etc.). Consumers should be able to take the information on tyre size designation and appropriate service description, as found on the vehicle tyre placard, and compare it with identical information found on the sidewall of the tire.

The vehicle's tyre placard should be in a standardised format and placed in a convenient, standardised location on all vehicles.

(26) Removal of Sidewall Maximum Inflation Value

The single most important factor in tyre care is proper inflation pressure. The maximum tyre pressure on the sidewall, which unique practical purpose is only for the definition of tyre testing conditions as per existing FMVSS 109, is a source of misinformation and confusion, and thus shall be removed from the sidewall. Removal of the maximum inflation number from the sidewall will improve safety. Any case the correct cold inflation pressure shall be given on the vehicle's tyre placard and clearly and conveniently communicated to consumers.

Dissemination of tyre Safety Information

(27) What Type of Information Needed

Motorists have two basic responsibilities with regard to safe tyre operation.

First, they should insure that the proper tyres are fitted on the vehicle. This can be accomplished by matching the tyre size designation, the load index, and the speed rating shown on the vehicle placard (as per our recommendation) with the size designation, the load index and the speed rating marked on the tire.

Second, they are responsible for maintaining the correct inflation pressure as shown on the vehicle placard. Any pressure below the placard pressure could result in

decreased vehicle handling and fuel economy, faster tyre wear, and possible tyre failure.

It is clear from various surveys that many operators do not maintain proper inflatior pressure as they have no actual warning that tyres are running underinflated. They may not understand the importance of proper tyre inflation or know the recommended frequency of inflation pressure checks. The maximum permissible inflation pressure shown on the tyre contribute to confuse them.

It is our recommendation that:
The operating pressures (specifying axle and type of service) be shown in a clear consistent location on the vehicle,
The maximum permissible inflation pressure be removed from the tyre to eliminate any possible confusion, appropriate and reliable pressure warning devices be fitted to any vehicle, and information about the importance of proper inflation pressure and the recommended frequency of inflation pressure checks be included in the vehicle or owner's manual.

Motorcycles and Trailers

(28) Include/Exclude From Amended Rules

As with other highway tyre categories, trailer tyres and motorcycle tyres (as well as the relevant vehicles) should be subjected to the same requirements.

Font Height for Labeling Information

(29) Height and Contrasting Colours for Symbols Required by 109, 119, Date Code, and UTQGS

There is no need to change the currently specified symbol heights. Any changes would result in massive changes to all existing moulds, which will require a significant capital outlay. The use of contrasting colours would greatly increase an already complex process and would not be practical, a part from any aestetical consideration which could drive the creativity of vehicle designers and consumers. Spatial constraints must be considered when laying out the location and dimension of letters and symbols especially with the intention to modify existing moulds.

Harmonisation Issues

(30) Other Standards Addressing Labeling Issues Raised in ANPRM (31) Minimise Unnecessary Differences

In Europe, ECE Regulations 30 and 54 address issues raised in this ANPRM. As the Agency is aware, the United Nations World Forum for Harmonisation of Vehicle

Regulations (ECE WP 29) is engaged in the process of developing a global technical regulation for tyres. We would also like to take this opportunity again to call the Agency's attention to the tyre industry's petition to revise FMVSS 109 as submitted in January 1999. The industry's 1999 proposal was labelled Global tyre Standards – 2000 (GTS-2000) and addressed various labeling and testing criteria which are relevant to the current rulemaking (a copy of GTS-2000, with supporting data is available in docket number NHTSA-2000-8011).

The 1998 Agreement of the World Forum for Harmonisation of Vehicle Regulations hopefully will promulgate a global technical regulation for tyres with the aim of unifying the separate national or regional standards at present in force in Europe, Canada, Japan, China, Saudi Arabia, Brazil, Uruguay, Korea, Mexico, and the United States so that all have the same requirements on labeling, testing, and/or certification requirements. There is excessive redundancy in the current situation and also a redundancy of conformity markings and requirements.